

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MINNEAPOLIS FIREFIGHTERS' RELIEF
ASSOCIATION, on behalf of itself and all others
similarly situated,

Plaintiff,

v.

BRISTOL-MYERS SQUIBB COMPANY,
PETER R. DOLAN, and ANDREW R.J.
BONFIELD,

Defendants.

JEAN LAI, individually and on behalf of all others
similarly situated,

Plaintiff,

v.

BRISTOL-MYERS SQUIBB COMPANY,
PETER R. DOLAN, and ANDREW R.J.
BONFIELD,

Defendants.

ELECTRONICALLY FILED

CIVIL ACTION No. 07cv5867 (PAC)

CIVIL ACTION No. 07cv6259 (PAC)

**NOTICE OF MOTION AND MOTION OF THE MINNEAPOLIS FIREFIGHTERS'
RELIEF ASSOCIATION FOR (1) CONSOLIDATION; (2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF LEAD PLAINTIFF'S CHOICE OF CO-LEAD
COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

Lead Plaintiff Movant, the Minneapolis Firefighters' Relief Association ("MFRA"), through its undersigned counsel, will and hereby does move this Court on a date and at such time as may be designated by the Court at the United States Courthouse, Courtroom 20-C, 500 Pearl Street, New York, NY, 10007, for an order: (1) consolidating the Related Actions; (2) appointing MFRA as Lead Plaintiff pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"); and (3) approving Lead Plaintiff's choice of Co-Lead Counsel.

This Motion is made on the grounds that MFRA believes consolidation is appropriate and that it is the most adequate plaintiff possessing claims arising out of the Exchange Act, having suffered estimated losses of approximately \$7,376. In addition, MFRA meets the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of class members' claims and it will fairly and adequately represent the class of persons that purchased securities of Bristol-Myers Squibb Company between March 22, 2006 through August 8, 2006. Further, MFRA has selected and retained counsel experienced in securities class actions as its counsel.

The facts and law supporting this Motion are fully set forth in the accompanying Memorandum of Law, and Declaration of Jeffrey P. Campisi dated August 27, 2007, both submitted in Support of MFRA's Motion for: (1) consolidation; (2) appointment of Lead Plaintiff; and (3) Approval of Lead Plaintiff's Choice of Lead Counsel.

DATED: August 27, 2007

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

By: _____ s/ Frederic S. Fox
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*Attorneys for Lead Plaintiff Movant the
Minneapolis Firefighters' Relief Association*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 27, 2007, I caused to be electronically filed the foregoing paper with the Clerk of the Court using the ECF System which will electronically send notification of such filing to the registered participants and paper copies will be sent via first-class mail postage pre-paid to those indicated as non-registered participants on August 27, 2007.

/s/ Jeffrey P. Campisi
Jeffrey P. Campisi

August 27, 2007